

May 15th, 2025

The Honorable Henry J. Ricardo
United States Magistrate Judge
United States District Court for the
Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl Street
New York, New York 10007-1312

Dear Your Honor:

The notice of removal to Federal Court, from the New York State Supreme Court, Commercial Division case of Simpson et al. v. Chassen et al., Docket #158055/2023, was posted this morning on ECF, 1:25-cv-04004-UA (formerly categorized as 1:25-cv-02372).

Although jurisdiction has been an issue since the bankruptcy dismissal (pending appeal) of JJ Arch LLC, 1:24-bk-10381 (JPM), in Oct 2024 (subject to appeal 1:24-cv-08649 (JAV)) and we requested consolidation of all SDNY cases subject to removal, including consolidation or cross-tracking with the bankruptcy related specifically to YJ Simco LLC, 1:25-bk-10437 (LGB) so that the same matter is in one court for adjudication.

Specifically, the emergency concern is narrowly focused on this one single property and business:

On this basis, my forthcoming affidavit of irreparable harm, I wish to request a Court conference for the purpose of temporarily staying the State Court's Orders of Receivership as they apply to my business at 1640 Montauk Highway, Town of Southampton, known as Rever Motors, operated under 1640 Motors LLC.

Receivership seems to have attempted to immediately shutter its operations, many customers are sending me urgent demands for a status update, and there is no way for customers' vehicles to be completed or delivered on the terms under agreement. Although all business is

properly documented, I worry that I am at risk of being sued, and my reputation is being severely damaged, by simply not being afforded an opportunity to complete the most pressing of customer deliveries due over the next 2-8 weeks.

Tomorrow my lawyer will seek to appear. I know that the Court is currently examining its jurisdiction, and this request is made simply to allow the business to operate so it can satisfy its obligations until the Court decides Mr. Chassen's motion. I also seek an opportunity for my incoming attorney to respond to his lawyer's opposition, and for all purposes to speak for me instead of communicating pro se. I do so at this time owing to the pressing nature of this issue and the everlasting harm to my business, customers, and reputation.

I ask the Court to schedule a Conference at its earliest convenience so that this issue can resolved before more irreparable harm is effectuated.

Respectfully Submitted,

/s/ Jeffrey Simpson